Invermere, Summary of Public Input

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Invermere Timber Supply Area, Summary of Public Input

Invermere Timber Supply Area

Timber Supply Review

Summary of Public Input

Ministry of Forests
Invermere Forest District
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This is a summary of the public input that has been received on the Timber Supply Review in the Invermere Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

◄ ▲ TOC ►

Invermere Timber Supply Area
Summary of Public Input

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B.C. Ministry of Forests

- Invermere Timber Supply Area, Summary of Public Input
- Background
- Public Review Process and Response
- Public Input
  - Timber Supply Analysis
    - Licensees' analysis
    - Other public input
  - Socio-Economic Analysis
    - Employment and community impacts
    - Non-timber values
  - Discussion Paper
    - Alternative practices
    - Commercial thinning
    - Allowable annual cut adjustment
- Related Input
    - Timber supply review process
    - Other land-use processes
    - Apportionment
- Appendix 1
  - Submissions received by the Invermere Forest District

Invermere, Summary of Public Input

Background

As part of the review of timber supply in the Invermere Timber Supply Area, the British Columbia Forest Service distributed the *Discussion Paper* and two technical reports, the *Timber Supply Analysis* and the *Socio-Economic Analysis*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information. This report summarizes the input received during the 90-day review period. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the Invermere Timber Supply Area.

The first section of this summary, Public Review Process and Response, outlines the public review process implemented by the Forest Service and describes the types of public input received. The second section, Public Input, summarizes the input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Invermere Forest District office.

Invermere, Summary of Public Input

◄ TOC ►

Public Review Process and Response

Invermere District staff actively solicited public input on the Timber Supply Review in the Invermere Timber Supply Area through the following actions:

- copies of the *Timber Supply Analysis, Socio-Economic Analysis* and *Discussion Paper* were directly mailed to 120 interested individuals and organizations within the Invermere Timber Supply Area. The *Discussion Paper* included a response form that readers were encouraged to complete and return to the district manager
- an information booth was staffed at the Invermere & District Trade Fair, and documents were distributed to interested persons
- four information sessions were held with representatives from local governments, Kootenay National Park and First Nations (see Table 1)
- four open houses were advertised extensively
- radio interviews were provided
- newspaper articles were encouraged

As Table 1 shows, approximately 40 individuals attended the information sessions and the open houses, in addition to approximately 1,000 who attended the Trade Fair. The Invermere Forest District also received two completed response forms and eight written submissions (see Appendix 1). The Invermere Timber Supply Area licensees also commissioned Timberline Forest Inventory Consultants to undertake an independent timber supply analysis. This report is referred to as the "licensees' analysis" in this summary.

Organizations (No. of participants)	**Date**
Information sessions	
Radium Town Council (4)	May 10, 1997
Invermere & District Trade Fair (1,000)	May 12-13
Columbia Lake Indian Band (5)	May 15, 1997
Regional District of East Kootenay (approx. 20)	June 2, 1997
Kootenay National Park staff (3)	July 28, 1997
Open houses	
Canal Flats (3)	May 17, 1997
Radium (0)	May 18, 1997
Invermere (2)	May 24, 1997
Canal Flats (3)	June 1, 1997

Table 1: Participation in public information activities

TOC

Invermere, Summary of Public Input

Public Input

In this section, public input on the information presented in the three Timber Supply Review documents for the Invermere Timber Supply Area is summarized under the following headings:

- Timber Supply Analysis
- Socio-Economic Analysis
- Discussion Paper

Public input on other issues or ongoing government processes that may influence timber supply in the Invermere Timber Supply Area in the future is summarized at the end of this section.

Invermere, Summary of Public Input

Timber Supply Analysis

Invermere, Summary of Public Input

Licensees' analysis

In the process of conducting an independent timber supply analysis, the consultant incorporated different land base and productivity assumptions from those used in the Forest Service analysis. These include:

- a slight increase to the timber harvesting land base by including 540 hectares designated as recreation reserves
- an additional increase of 1,626 hectares following a reduction in the area removed from the timber harvesting land base as economically or environmentally infeasible to harvest
- the use of updated forest productivity information

The changes to the above three factors result in an increase in the predicted timber supply levels.

The licensees' analysis then examines the impact of the following factors and compares them with the Forest Service analysis:

- **More refined analysis units**

Refining the analysis units (subdividing them by age range), combined with a recalculation of minimum harvestable ages, produces no significant impact on timber supply.

- **Future productivity estimates**

When the timber productivity expected from sites currently occupied by older forests is adjusted upward, a marginal increase in timber supply results.

- **Reductions for ecosystem networks**

In the Forest Service analysis, the timber harvesting land base was reduced by eight per cent to provide for forest ecosystem networks that connect important habitats throughout the timber supply area. The licensees' analysis cites the timber supply impacts of this approach and asserts it does not consider the dynamics of forest development.

The licensees' analysis proposes that the eight per cent reduction be eliminated and that networks instead be subject to the same forest cover constraints that apply to moderately sensitive visual zones—partial retention. This would significantly increase the short- and long-term timber supply, according to the licensees' analysis.

- **Ungulate winter range**

The licensees' analysis maintains the forest cover requirements in this zone—that no more than 33 per cent of the timber harvesting land base can have stands less than 15 metres tall at any time—have a significant negative impact on timber supply and do not meet habitat objectives. By proposing different requirements and using a different model, the licensees' analysis is able to increase timber supply considerably.

- **Steep slopes**

In the Forest Service analysis, sites considered too steep for harvesting were removed from the timber harvesting land base. The licensees' analysis proposes a modified approach, which increases the land base by about three per cent.

- **Non-merchantable forest types**

Rather than removing all of these types from the timber harvesting land base, as was done in the Forest Service analysis, the licensees' analysis proposes a modified removal on slopes less than 30 per cent. This increases the land base by about two per cent and has a slight impact on timber supply.

- **Regeneration delay**

The Forest Service analysis uses a regeneration delay of four years for planted areas and seven years for naturally regenerated areas. The licensees' analysis recommends two and five years, respectively.

When all the above changes are combined, the licensees' analysis states the short- and long-term timber supply is significantly increased compared to that indicated in the Forest Service base case.

Invermere, Summary of Public Input

Other public input

- **Size of the timber harvesting land base**

A forest industry submission maintains further information is needed to provide confidence that double-counting did not occur in the various reductions from the timber harvesting land base. For example, an area may have been removed twice because it has steep slopes and low growing potential.

Another submission questions why it was assumed that 10.5 per cent of the timber harvesting land base would be lost to roads, trails and landings when the *Soil Conservation Guidelines* limit allowable losses to seven per cent.

A third submission notes that the estimates of the land base are incomplete because they do not account for other ongoing processes, such as the regional land-use plan or the Forest Practices Code, or for changes in harvesting and processing methods.

The removal of areas considered to have stands that are not environmentally or economically feasible to harvest is questioned by another submission. While these stands may not be useful for sawlogs, other products such as posts are feasible, according to this individual. Following the harvest, such sites can then be returned to full productive capacity.

- **Minimum harvestable age**

One respondent suggests minimum harvestable ages could be reduced by 10 years if intensive silviculture were practised.

- **Productivity estimates**

One respondent states that the productivity estimates for second-growth forests are suspect and very liberal, but offers no evidence except to point to failures in Europe where more favourable climates prevail.

- **Forest management practices in visually sensitive areas**

One submission suggests these should be relaxed since the tourism industry produces low-paying jobs, compared to the forest industry. This individual states that ski hills and golf courses are as visually disturbing as clearcuts; the latter, at least, are reforested and don't cost money to enter.

Another respondent contends that, in selecting management objectives, visual quality should be secondary to environmental values such as wildlife winter range, biodiversity, etc. If a choice must be made to reduce timber supply constraints, environmental quality must take precedence over viewscapes for tourists.

- **Wildlife and fish habitat requirements**

According to one submission, forest cover requirements for deer winter range should be relaxed by at least five per cent. This individual maintains that deer do not feed in mature forests, but often follow harvesting crews to eat the

mosses and lichens growing on felled trees. The need for cover can be met by leaving groups of trees on sunny slopes and by partial cutting. This individual also asks why cattle are allowed to graze in these areas if concerns for deer are so high.

One submission questions the boundaries of the area of core caribou habitat; in particular, it asks whether the upper Spillimacheen River was included. The harvest level guidelines developed for the core areas are satisfactory, according to this individual, but because caribou are wide-ranging, detailed planning is required over a broad area to ensure the range of habitats used in each season is available and connected.

The submission from Kootenay National Park staff contains the following comments regarding fish and wildlife values:

- it offers strong support for ecosystem networks but expresses concern that they may not be wide enough to function effectively as wildlife corridors

- further wildlife habitat measures are needed, such as maintenance of deciduous trees, large rotten wildlife trees, and openings with understory forage; these are not found in dense, even-aged, managed forests

- green-up and forest cover requirements do not appear to be sufficient to protect the functioning of watersheds that contain high-value fish resources

The Park staff submission also states intensive silvicultural practices in managed stands may exacerbate Armillaria root disease problems, leading to poor growth or tree mortality. Such fungal diseases are a critical agent of biodiversity and an essential factor in the creation of suitable wildlife trees.

An individual respondent expresses support for more forest ecosystem networks.

- **Biodiversity**

One submission agrees with the requirement to maintain at least 10 per cent of each management zone as older forests, but speculates whether partial cutting and simulation of older-forest characteristics could help minimize this reduction.

Another respondent predicts the amount of older forests remaining in 50 years will be minuscule compared to historical amounts, putting at risk wildlife that depend on this type of forest. This individual also states that inoperable areas may not provide the characteristics needed for species that depend on older forests, and emphasizes the need to protect representative forests. The Kootenay National Park submission and another individual submission echo these concerns, adding that 140-year-old forests do not provide adequate habitat for some old-growth-dependent species.

The Kootenay National Park submission also stresses the importance of maintaining a mix of forests of all ages, including some older than 250 years, in order to protect biodiversity values and to provide long-term sources of high-quality wood.

- **Estimates of unsalvageable timber losses**

A forest industry submission questions whether the estimate used in the Forest Service analysis reflects the higher levels of utilization currently being practised.

Invermere, Summary of Public Input

Socio-Economic Analysis

Invermere, Summary of Public Input

◄ TOC ►

Employment and community impacts

A forest industry submission asserts the importance of the forest sector was underestimated in the *Socio-Economic Analysis*. The following assertions are made:

- forestry accounts for 30 per cent of after-tax income in the timber supply area, not 22 per cent as stated
- local pulp mill employment is understated by 35 per cent
- intensive silviculture employment is not included
- Forest Service employment should be recognized as dependent on harvest levels
- by excluding non-cash benefits such as pension payments, contributions to insurance plans and health care premiums, forest sector employee income is understated
- federal government revenue was ignored, e.g. income tax
- payments such as unemployment insurance and social assistance do not have the same significance to the economy as do sectors that generate wealth

In general, this forest industry submission asserts that the employment and income impacts from lost forestry jobs cannot be mitigated or alleviated through other initiatives.

Another submission contends that while major short-term job losses may occur with the needed reduction in timber supply, this will be offset by the re-emergence of smaller specialty mills, value-added manufacturing, increased silviculture, commercial thinning, and more labour-intensive harvesting and road-building.

A tourism operator makes the following comments:

- the economic benefits of heli-skiing and heli-hiking are underestimated in the *Socio-Economic Analysis*. These activities generate an annual revenue of $13 million (not $3.5 million) and employ 225 people (not 90) full-time on a seasonal basis
- revenue from the movie industry should be included—an estimated $80 million over the past three years
- considering that tourism generates 33 per cent of total employment and 16 per cent of total basic income, this sector should have received a comprehensive review in the analysis

Another respondent questions the inclusion of guide-outfitting with tourism and outdoor recreation, saying this dilutes its relevance and obscures its differences from that sector. Guide-outfitting is affected less by visual quality management and more by access development. This individual maintains that increased access has more detrimental effects on wildlife—and therefore on guide-outfitting—than benefits for humans. According to this submission, the effect of changes in harvest levels should have been examined in the same detail for other sectors as it was for forestry.

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Invermere, Summary of Public Input

◄ TOC ►

Non-timber values

The submission from the forest industry claims that allegations made in the *Socio-Economic Analysis* regarding the environmental impacts of harvesting are unsubstantiated because of the following:

- no study has been done to link the alleged decline of bull trout with harvesting activity
- the future of wildlife is affected more by how government manages road access and rural settlements than by road construction itself
- many of the impacts listed are general and may not even apply to the Invermere Timber Supply Area
- the broad statement that current harvesting practices will result in a decline of biodiversity values is oversimplified and incorrect
- it is unclear whether the caribou population is more sensitive to habitat availability or to changes in predator numbers

One submission raises the following questions:

- what are the criteria for determining which older forests are managed?
- are Upper Dutch and Findlay Creek watersheds still unprotected and fragmented?
- in what drainages are fish declining due to harvest activity?
- what riparian areas were identified, and are maps available?

Since the *Socio-Economic Analysis* describes bighorn sheep and grizzly bear as rare or uncommon and susceptible to large-scale disturbances, one respondent asks how this was factored into the analysis.

Another respondent maintains that although non-timber values will continue to provide increasingly greater benefits to society they were underrated in the analysis.

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Invermere, Summary of Public Input

◄ TOC ►

Discussion Paper

Several issues raised in the *Discussion Paper* prompted public input.

◄ ▲ TOC ►

Invermere, Summary of Public Input

Alternative practices

One respondent declares there is a need to shift away from a clearcut/slashburn/replant system of forest management to management of a continuous forest with selective cutting. This would produce more job opportunities now and make the land base more productive in the long run. As well, it would conserve more mature timber for the future when it will be more valuable, according to this individual.

One respondent predicts skyline logging, with the participation of the heli-industry, would increase harvesting options above and below operability lines.

Another respondent maintains the three-pass harvesting system is inadequate to protect biodiversity values and recommends either a four- or five-pass system, depending on site productivity.

Invermere, Summary of Public Input

◄ TOC ►

Commercial thinning

One industry submission states that 15,000 hectares of lodgepole pine stands have been identified as candidates for commercial thinning. This opportunity should be included in the timber harvesting land base since value-added facilities exist to use it.

An individual maintains the percentage of mature to immature forests (more than 50 per cent) indicates a significant opportunity for commercial thinning. Unless the major timber companies use this opportunity, incentives should be offered to smaller operators to do the thinning, according to this submission.

◄ ▲ TOC ►

Invermere, Summary of Public Input

Allowable annual cut adjustment

Several submissions discuss whether and how the allowable annual cut should be adjusted. This input varies from a suggestion that a reduction is not needed, to support for immediate reductions—either to the long term sustainable level or by as much as 40 per cent to protect tourism, biodiversity and wildlife values. Most of the input agrees a reduction to the allowable annual cut is inevitable, at least over the long term. Several alternative ways to implement a reduction are suggested:

- based on its re-analysis of the data, the licensees' analysis indicates the current allowable annual cut can be continued for 40 years, followed by 10 per cent reductions each decade for the following 50 years. Alternatively, the licensees' analysis predicts an immediate 10 per cent reduction could be implemented and the resulting harvest level sustained for 70 years

- to allow for the implementation of the regional land-use plan, Forest Practices Code, land claims, and measures to offset impacts, one individual recommends a maximum five per cent reduction for the next five years

- to ensure the industry will be stable in the future, to protect future generations from suffering for our overcutting, to protect non-timber values, and to accommodate the uncertainty inherent in some critical factors or created by current initiatives such as the Forest Practices Code, three submissions recommend reducing the allowable annual cut to the long-term level as soon as possible. One questions whether this level is low enough to protect all other values

- one respondent states it is important to step down the timber supply so that it never drops below the long-term timber supply level;

- one industry submission contends that any reduction would seriously jeopardize its operations because of its precarious timber supply position, but does not specify a preference for an allowable annual cut level

- in order to slow the conversion of old forests to younger, managed forests, one submission prefers an immediate 40 per cent reduction

One submission suggests no more than 50 per cent of the allowable annual cut should be allocated to the two major licensees, with the remainder going to the woodlot program, small business program, specialty and value-added manufacturing sector, and commercial thinning.

Another submission expresses concern about the distribution of the cut across the landscape, stating that prolonged concentrations of harvesting in his guide-outfitting area will adversely affect his business.

Invermere, Summary of Public Input

Related Input

Other comments are summarized here to indicate perspectives that may influence timber supply issues in the future.

Invermere, Summary of Public Input

Timber supply review process

One submission questions why public input is only solicited at the end of the process. This only allows for input on assumptions and methods already used in the analysis, rather than input on what should be used.

This individual also questions why all other sectors and values are portrayed as "constraints" on harvesting levels if integrated resource management is the direction of the future. Other values can't be managed properly if they're always considered secondary to timber harvesting.

Invermere, Summary of Public Input

Other land-use processes

Two submissions assert the importance of protecting the integrity of the timber harvesting land base, once processes such as the land-use plan and implementation of the Code are complete.

Another respondent maintains the land-use plan does not protect representative forests in low to mid-elevations. To achieve its goals, the government must remove some productive low-elevation sites from the timber harvesting land base.

Invermere, Summary of Public Input

Apportionment

One submission recommends the woodlot allocation be increased to five per cent from one per cent and that woodlots be assigned to visually sensitive areas, deer winter habitat, community watersheds, environmentally sensitive areas and ar..s close to communities. This individual believes management objectives will be better met because of the sustainable, selective and labour-intensive nature of woodlot harvesting.

Invermere, Summary of Public Input

Appendix 1

Invermere, Summary of Public Input

Submissions received by the Invermere Forest District

Government agencies
Kootenay National Park

Forest industry
Brisco Wood Preservers Ltd.
Invermere Timber Supply Area Licensees (timber supply analysis prepared by Timberline Forest Inventory Consultants)
Interior Lumber Manufacturers' Association
Woodlot licensee

Interest groups
Sylvan Consulting
R.K. Heli-Ski Panorama Inc.
White Swan Lake Outfitters

Individuals
Two submissions